

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION**

CASE NO.: 2:22-cv-6510

NICK KOUDIS,

Plaintiff,

v.

ARMBAR INDUSTRIES INC,

Defendant.

MOTION FOR EXTENSION OF TIME

Plaintiff NICK KOUDIS by and through his undersigned counsel, hereby moves this Honorable Court for an 21 day extension of time for Defendant Armbar Industries Inc. to answer the Complaint, and as grounds therefore states as follows:

1. Defendant was served on November 10, 2022, and their Answer is currently due December 1, 2022.
2. Defendant's counsel contacted our office today, November 21, 2022, and requested additional time to allow the parties to further investigate and discuss the asserted claims, as well as possible resolution. Further, Defendant is not admitted in this district and requires local counsel. An extension will allow Defendants time to obtain local counsel, if the dispute cannot be resolved.
3. The undersigned is out of the office until after the Thanksgiving Holiday, and has limited availability to discuss the matter with Defendant's counsel prior to the current response deadline of December 1.

SRIPLAW

CALIFORNIA ♦ GEORGIA ♦ FLORIDA ♦ TENNESSEE ♦ NEW YORK

WHEREFORE, Plaintiff NICK KOUDIS prays this Honorable Court for an extension of 21 days, up to and including December 22, 2022, for the defendant Armbar Industries Inc. to answer the complaint.

DATED: November 21, 2022

Respectfully submitted,

/s/ Eliezer Lekht

ELIEZER LEKHT

New Jersey Bar Number: 330192021

eliezer.lekht@sriplaw.com

SRIPLAW, P.A.

175 Pearl Street

Third Floor

Brooklyn, NY 11201

332.600.5599 – Telephone

561.404.4353 - Facsimile

Counsel for Plaintiff Nick Koudis